

RAB:DDB:CSK
F.#2010R01746

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

SASSINE RAZZOUK,

Defendant.

- - - - -X

I N F O R M A T I O N

Cr. No. 11-430
(T. 18, U.S.C.,
§§ 666(a)(1)(B),
981(a)(1)(D), 2 and
3551 et seq.; T. 21,
U.S.C., § 853(p); T. 26,
U.S.C., § 7201; T. 28,
U.S.C. § 2461(c))

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
(Bribery)

1. In or about and between January 2006 and January 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SASSINE RAZZOUK, being an agent of an organization, to wit: Consolidated Edison Company of New York, Inc. ("Con Ed"), that received benefits in excess of \$10,000 in Federal assistance in a one-year period, did knowingly, intentionally and corruptly solicit, demand, accept and agree to accept something of value from another person, to wit: John Doe, an individual whose identity is known to the United States Attorney, intending to be influenced and rewarded in connection with business and a series of

transactions of Con Ed, involving things of value of \$5,000 or more.

(Title 18, United States Code, Sections 666(a)(1)(B), 2 and 3551 et seq.)

COUNTS TWO THROUGH FOUR
(Tax Evasion)

2. On or about the dates listed below, within the Eastern District of New York and elsewhere, the defendant SASSINE RAZZOUK, a resident of Staten Island, New York, together with others, did knowingly and willfully attempt to evade and defeat a large part of the income tax due and owing by him and his spouse to the United States of America for the calendar years 2007 through 2009, by filing and causing to be filed with the Internal Revenue Service Center, a false and fraudulent joint U.S. Individual Income Tax Returns, Forms 1040, on behalf of himself and his spouse, wherein he under-reported his taxable income for said calendar years, resulting in substantial additional taxes due and owing to the United States of America as set forth below.

COUNT	DATE FILED	APPROXIMATE UNREPORTED TOTAL INCOME	APPROXIMATE UNREPORTED TAX DUE AND OWING
TWO	4/15/08	\$1,526,819	\$526,949
THREE	4/15/09	\$1,706,153	\$570,917
FOUR	4/15/10	\$1,914,969	\$656,313

(Title 26, United States Code, Section 7201; Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of the bribery offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(D) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense, including but not limited to the following:

Money Judgment

a. a sum of money in United States Currency to be determined;

Specific Properties

b. any and all funds currently on deposit or transferred to or through SECUREVEST FINANCIAL GROUP, INC. ACCOUNT NO. XXX-X479, HELD IN THE NAME OF OR FOR THE BENEFIT OF MDM CAPITAL, INC. AND SERVICED BY OR THROUGH JP MORGAN CHASE CLEARING CORP., UP TO AND INCLUDING \$4 MILLION AND ANY AND ALL PROCEEDS TRACEABLE THERETO seized pursuant to a court-authorized seizure warrant on or about January 18, 2011;

c. any and all funds currently on deposit or transferred to or through SECUREVEST FINANCIAL GROUP, INC. ACCOUNT NO. XXX-X480, HELD IN THE NAME OF OR FOR THE BENEFIT OF SASSINE RAZZOUK AND SERVICED BY OR THROUGH JP MORGAN CHASE

CLEARING CORP., UP TO AND INCLUDING \$1.3 MILLION AND ANY AND ALL PROCEEDS TRACEABLE THERETO, seized pursuant to court-authorized seizure warrants on or about January 18, 2011 and April 7, 2011;

d. any and all funds currently on deposit or transferred to or through FIDELITY INVESTMENT ACCOUNT NO. XXX-XX2099, HELD IN THE NAME OF OR FOR THE BENEFIT OF SASSINE RAZZOUK UP TO AND INCLUDING \$1.2 MILLION AND ANY AND ALL PROCEEDS TRACEABLE THERETO, seized pursuant to a court-authorized seizure warrant on or about January 18, 2011;

e. any and all funds on deposit or transferred to or through J.P. MORGAN CHASE ACCOUNT NO. 2945051197, HELD IN THE NAME OF SASSINE RAZZOUK, UP TO AND INCLUDING \$362,000.00, AND ALL PROCEEDS TRACEABLE THERETO, seized pursuant to a court-authorized seizure warrant on or about February 2, 2011;

f. all right, title and interest in ONE WHITE, 2010 MERCEDES-BENZ E350, 4 DOOR VEHICLE, BEARING VIN NUMBER # WDDHF5GB9AA058261, AND NY LICENSE PLATE NO. CEG 1108, TITLE TO WHICH IS HELD IN THE NAME OF SASSINE RAZZOUK, seized pursuant to a court-authorized seizure warrant on or about January 18, 2011; AND

g. any and all right, title and interest in ONE WHITE, 2010 MERCEDES-BENZ SLK CONVERTIBLE VEHICLE, BEARING VIN NUMBER # WDBWK5JAXAF230697, AND NJ LICENSE PLATE NO. ZSC 10P, TITLE TO WHICH IS HELD IN THE NAME OF GRACE RAZZOUK, seized pursuant to a court-authorized seizure warrant on or about January 18, 2011.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

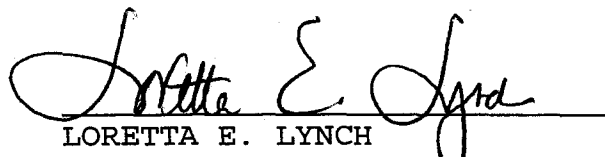
b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 981(a)(1)(D); Title 21, United States Code, Section 853(p))


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK